

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 19-10096 CMB
	:	
ERIC JON KUHN AND	:	
TAMIKA ALLEN KUHN, HIS WIFE,	:	HON. CARLOTA M. BÖHM
Debtors	:	
	:	
M&T BANK,	:	CHAPTER 13
Movant,	:	
	:	RELATED TO CLAIM NO. 9
v.	:	
	:	
ERIC JON KUHN AND	:	
TAMIKA ALLEN KUHN, HIS WIFE; and	:	
RONDA J. WINNECOUR, ESQUIRE,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE  
FILED IN COMPLIANCE WITH THE LOCAL RULES

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan  
is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,  
THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin  
Michael S. Jan Janin, Esquire  
PA Id. No. 38880  
2222 West Grandview Boulevard  
Erie, Pennsylvania 16506-4508  
Phone: (814) 833-2222, Ext. 1045  
Facsimile: 814-833-6753  
[mjanjanin@quinnfirm.com](mailto:mjanjanin@quinnfirm.com)  
Counsel for Debtors, Eric Jon Kuhn and  
Tamika Allen-Kuhn

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 19-10096 CMB
	:	
ERIC JON KUHN AND	:	
TAMIKA ALLEN KUHN, HIS WIFE,	:	HON. CARLOTA M. BÖHM
Debtors	:	
	:	
M&T BANK,	:	CHAPTER 13
Movant,	:	
	:	RELATED TO CLAIM NO. 9
v.	:	
	:	
ERIC JON KUHN AND	:	
TAMIKA ALLEN KUHN, HIS WIFE; and	:	
RONDA J. WINNECOUR, ESQUIRE,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

**CERTIFICATE OF SERVICE OF DECLARATION REGARDING  
NOTICE OF MORTGAGE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on November 11, 2022.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was sent via CM/ECF Notification to:

- Office of the United States Trustee at [ustpreregion03.pi.ecf@usdoj.gov](mailto:ustpreregion03.pi.ecf@usdoj.gov)
- Ronda J. Winnecour, Chapter 13 Trustee at [cmecf@chapter13trusteewdpa.com](mailto:cmecf@chapter13trusteewdpa.com)
- Brian Nicholas for Creditor M&T BANK at [bnicholas@kmlawgroup.com](mailto:bnicholas@kmlawgroup.com)

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: November 11, 2022

Respectfully submitted,  
THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin  
Michael S. Jan Janin, Esquire  
PA Id. No. 38880  
2222 West Grandview Boulevard  
Erie, Pennsylvania 16506-4508  
Phone: (814) 833-2222, Ext. 1045  
Facsimile: 814-833-6753  
[mjanjanin@quinnfirm.com](mailto:mjanjanin@quinnfirm.com)  
Counsel for Debtors, Eric Jon Kuhn and  
Tamika Allen-Kuhn

1576255